

Hoffmeyer, Darcy

From: Peter Boyce [boycep@rpi.edu]
Sent: Monday, February 10, 2003 5:24 PM
To: Hoffmeyer, Darcy
Cc: figuem@rpi.edu; frerid@rpi.edu
Subject: 2nd draft of energy star exit signs

Dear Ms Hoffmeyer

I found the second draft of the revised Energy Star specification for exit signs to be a great disappointment. The first specification for Energy Star exit signs included photometric measurements to ensure that the Energy Star exit signs were of good visibility. The revised version has scrapped all these measurements, adopting a UL listing as sufficient to ensure good visibility. This is disappointment because the UL requirements are no guarantee of good visibility. Specifically, the UL requirements, as does the revised Energy Star specification, allow low luminance exit signs, such as photoluminescent and radioluminescent signs, to be used. It is well established that these signs will become invisible in a smoke at a much lower smoke density than will exit signs with higher luminances. It may be convenient for the industry to have only one standard to meet but I had hoped that the EPA would show more concern for the safety of the user and would not show the same shameful willingness to ignore the effects of smoke on exit sign visibility that UL does.

A similar but smaller scale objection relates to the removal of the prohibition on mirrored and transparent backgrounds to exit signs. Exit signs are read and understood by the contrast the letters make with the background. With transparent or mirrored exit sign backgrounds there is no guarantee as to what the contrast will be. Again, the revised specification is an abandonment of what really matters about an exit sign, i.e., its visibility.

Sincerely

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